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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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ZOHA DEVELOPMENT, LLC, a  
Nevada limited liability company;  
RONALD SASSANO, an individual,

Plaintiffs,

vs.

MCIG, INC, a Nevada corporation;  
SCALABLE SOLUTIONS L.L.C., a  
Nevada limited liability company;  
MICHAEL HAWKINS, an individual;  
CARL G. HAWKINS, an individual;  
PAUL ROSENBERG, an individual;  
DOE Individuals 1-10; and ROE  
Entities I-X,

Defendants.

Case No.: 2:18-cv-79-RFB-GWF

**STIPULATION TO (I) STAY  
FURTHER PROCEEDINGS  
PENDING THE COURT'S  
ADJUDICATION OF  
DEFENDANTS' MOTION  
TO DISMISS; (II) DISMISS  
SCALABLE SOLUTIONS,  
LLC AND CARL G.  
HAWKINS, WITHOUT  
PREJUDICE; AND (III)  
STRIKE PARAGRAPHS 94-  
101 OF THE PLAINTIFFS'  
COMPLAINT**

Gary C. Milne, Esq. and Douglas D. Gerrard, Esq. of GERRARD COX  
LARSEN (Counsel for Defendants MCIG, INC, a Nevada corporation;

1 MICHAEL HAWKINS, an individual; CARL G. HAWKINS, an individual;  
2 PAUL ROSENBERG, an individual) together with AM Santos, Esq. of AM  
3 SANTOS LAW, CHTD (counsel for Plaintiffs RON SASSANO AND ZOHA,  
4 DEVELOPMENT, LLC) hereby stipulate to the following:  
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6  
7 ***STIPULATED MATTERS***

8 1. As of this date, Plaintiffs' counsel has been unable to serve the  
9 now defunct entity, SCALABLE SOLUTIONS L.L.C. (SCALABLE). Upon  
10 information and belief, its charter (or the equivalent) with the Nevada  
11 Secretary of State has been revoked. Thus, the parties now before the Court,  
12 hereby stipulate to the dismissal of SCALABLE, without prejudice.  
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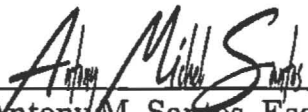
14 2. Upon conferring, and after further deliberation, the parties now  
15 before the Court hereby stipulate to the dismissal of all claims as against  
16 Defendant CARL G. HAWKINS, without prejudice, ~~and to the striking of~~  
17 ~~paragraphs 94 – 101 of the Plaintiffs' Complaint (ECF No. 1).~~ 3. Subject to the  
18 Court's indulgence, the parties hereby stipulate to staying or otherwise tolling  
19 this matter until the Court has (i) deliberated upon Defendants' Motion to  
20 Dismiss, Plaintiffs' Response, and the Reply thereto as filed by Defendants; (ii)  
21 rendered its decision; and (iii) entered the resulting Order as to same.  
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25 **SO STIPULATED.**

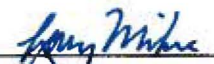
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27 Dated, May 16, 2018  
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2 **A.M. SANTOS LAW, CHTD.**

**GERRARD COX LARSEN**

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Attorneys for Defendants

11  
12 IT IS ORDERED that the request to strike paragraphs 94-101 of the Plaintiffs' Complaint [ECF  
13 No. 1 is denied.

14 **SO ORDERED**

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17 RICHARD F. BOULWARE, II  
18 UNITED STATES DISTRICT JUDGE

19 DATED this 18th day of May, 2018.  
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**CERTIFICATE OF SERVICE**

Pursuant to FRCP Rule 5, I hereby certify that I am an employee of the law firm of AM Santos Law, and that on the 16<sup>th</sup> day of May, 2018 I caused a copy of this **STIPULATION TO (I) STAY FURTHER PROCEEDINGS PENDING THE COURT'S ADJUDICATION OF DEFENDANTS' MOTION TO DISMISS; (II) DISMISS SCALABLE SOLUTIONS, LLC AND CARL G. HAWKINS, WITHOUT PREJUDICE; AND (III) STRIKE PARAGRAPHS 94-101 OF THE PLAINTIFFS' COMPLAINT** to be filed and served via ECF on the individuals below:

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